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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte Submission

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Application of SBC Communications Inc. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas*, CC Docket No. 00-4

Dear Ms. Salas:

Enclosed for filing is a paper responding to questions raised by Commission staff about Southwestern Bell Telephone Company's "hot cut" performance for unbundled local loops. This information is being provided at the direct request of Commission staff. The paper is accompanied by verifications of affiants William Dysart (covering Responses 1-4) and Candy Conway (covering Response 5).

Please let me know if you have any questions about this matter.

Sincerely,

Priscilla Hill-Ardoin

cc: Mr. Dever (1 copy)
Ms. Egler (1 copy)
Mr. Jennings (1 copy)
Ms. Rosenworcel (1 copy)
Ms. Stephens (1 copy)
Ms. Wright (4 copies)
Ms. Farroba, Texas PUC (1 copy)
Ms. Heisler, DOJ (1 copy)
ITS (1 copy)

"HOT CUT" ISSUES

1. Collection of Monthly Performance Data for Frame Due Time Cutovers

SWBT currently reports data for two measurements related to Coordinated Hot Cuts: Performance Measurement ("PM") 114 – Percentage of Premature Disconnects (Coordinated Cutovers) and PM 115 – Percentage of SWBT Caused Delayed Coordinated Cutovers. In addition, SWBT has agreed to implement PM 114.1 – Loop Disconnect/Cross Connect Interval. See Dysart Aff. ¶¶ 659, 661.

SWBT originally used only the coordinated hot cut ("CHC") process, and this process historically has been used for the majority of hot cuts. See Conway Aff. ¶ 79 (2,375 CHCs in November 1999, versus 653 conversions using the Frame Due Time ("FDT") process). Therefore, the Texas PUC-mandated performance reporting has not included data on FDT cutovers. Beginning with February 2000 data to be reported in March 2000, however, SWBT will disaggregate its performance reports for PMs 114, 114.1, and 115 by CHC and FDT cutovers.

2. Loop Disconnect/Cross Connect Interval Data

In addition to SWBT's routine performance reports, paragraphs 652-656 of the Dysart Affidavit reported sample data for loop disconnect/cross connect intervals, based information for all cutovers in Texas during August, September, and October 1999 that had both start and stop times available in the cutover log. Not all cutover logs during these months contained both a start and stop time, due to varying proficiency levels among technicians responsible for recording this information. As of the end of November and beginning with December data, however, a specific process for collecting this information has been defined and implemented. Each tester in SWBT's Local Operations Center ("LOC") has been trained and provided two job aids on the logging procedures to make sure that information including the start and stop time is documented for each cutover. These steps were taken to implement PM 114.1, which requires the LOC technician to note the time the cutover was started and stopped. The following tables are based upon the results collected in Texas in December for PM 114.1, disaggregated by the Coordinated Hot Cut ("CHC") and FDT methods.

December CHC and FDT Completion Intervals (Including CLEC-Caused Misses)[1]

	# of Loops	Cuts ≤ 30 Min.	% ≤ 30 Min.	Cuts ≤ 1 Hr.	% ≤ 1 Hr.	Cuts ≤ 2 Hrs.	% ≤ 2 Hrs.
CHC	1284	655	51%	1055	82.2%	1191	92.8%
FDT	1666	1502	90.2%	1563	93.8%	1584	95.1%

December CHC and FDT Completion Intervals (Excluding CLEC-Caused Misses for Base of Cuts)

	# of Loops (before exclusions)	Cuts ≤ 30 Min.	% ≤ 30 Min.	Cuts ≤ 1 Hr.	% ≤ 1 Hr.	Cuts ≤ 2 Hrs.	% ≤ 2 Hrs.
CHC	1284	655	58.4%	1055	86.3%	1191	95.3%
FDT	1666	1502	90.8%	1563	93.8%	1584	96.8%

3. Quality of Loops Provisioned Through Hot Cuts

In the Bell Atlantic New York Order, FCC 99-404, ¶¶ 299-303, the FCC relied upon Bell Atlantic's "Installation Report Within 7 Days," or "I-7," measure to assess the quality of loops provisioned through hot cuts. SWBT uses an Installation Report Within 30 days (I-30) measure to report SWBT's quality of provisioning for loops in general. (See PM 59.) SWBT does not disaggregate this measure for Coordinated Hot Cuts. In response to the FCC staff's request, however, SWBT has collected data for Installation Reports within 10 days (I-10) for December 1999, which more closely approximates the I-7 reports deemed relevant in the Bell Atlantic New York Order. The following reflects the I-10 reports associated with the CHC and FDT cutovers listed above:

December CHC and FDT I-10 Reports

	# of Loops	# of I-10 Reports	% I-10 Reports
CHC	1284	28	2.18%
FDT	1666	48	2.88%
Total	2950	76	2.58%

As this table shows, SWBT's trouble rate after 10 days was approximately 2 percent, the level deemed nondiscriminatory for troubles after 7 days in the Bell Atlantic New York Order, ¶ 300.

[1] CLEC-caused misses are identified by the LOC technician responsible for the provisioning of the service. The technician applies a missed function code to the order information in SWBT's WFA system. Codes for CLEC-caused misses include: A23 - No status or response received from CLEC; S1 - Subscriber change; and A20 - Subscriber wiring/equipment problem.

4. UNE Provisioning

The Commission staff have requested the following breakdown of UNE loop provisioning methods for 8dB and 5dB loops:

Loop Provisioning in December 1999

	# of Loops	%
CHC	1284	20.9%
FDT	1666	27.2%
Conversion Without FDT or CHC	2523	41.1%
New Loops	660	10.8%

5. Use of Hot Cuts to Convert Customers from CLEC Service to SWBT Service

When SWBT's retail operations win a customer from a CLEC that has been serving the customer using an unbundled loop, SWBT uses the same "hot cut" and number portability procedures and processes to execute the conversion as are used to convert service from SWBT to a CLEC. New facilities are used to serve the customer only in unusual cases, where specific customer requirements make the existing facilities used to serve the customer inadequate. For coordinated hot cuts on behalf of SWBT's retail operations, the Local Number Portability Center ("LNPC") uses the same resources and time slots as are available to CLECs. SWBT's retail operations are expected to meet the same requirements as CLECs for obtaining complete and accurate order information from the end user customer and for starting conversions at the scheduled time. SWBT's retail operations have chosen to request a due date interval of 6 days from the day they provide the LNPC with the service request. This is longer than the 3 to 5 day standard interval for CLEC customers with orders of less than 21 numbers.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on January 18, 2000.

William R. Dysart

William R. Dysart
Director-Performance Measures-SWBT

STATE OF MISSOURI
CITY OF ST. LOUIS

Subscribed and sworn to before me
this 18th day of January, 2000.

Mary Ellen Kuhlmeier

Notary Public

NOTARY [illegible] MISSOURI
MY COMMISSION [illegible] 2001

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on 1/18, 2000.

Candy R. Conway

CANDY R. CONWAY
DIRECTOR-LOCAL OPERATIONS

STATE OF TEXAS
COUNTY OF TARRANT

Subscribed and sworn to before me
this 18 day of January, 2000.

Notary Public

CORY COKER
NOTARY PUBLIC
STATE OF TEXAS
My Comm. Exp. 7-28-2003